

UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NEW HAMPSHIRE

In re)	
James M. Hosking)	
Jennifer L. Hosking)	
)	Case No. 17-11306-BAH
Debtor)	
)	Chapter 13
)	
U.S. Bank Trust National Association)	
)	
)	
Movant)	
v.)	
)	
James M. Hosking)	
Jennifer L. Hosking)	
Respondent)	

DEBTORS' OBJECTION TO MOTION FOR RELIEF FROM AUTOMATIC STAY
FILED BY U.S. BANK TRUST

NOW COME, James M. Hosking and Jennifer L. Hosking (hereinafter "Debtors"), the Debtors in the above-captioned matter, by and through their attorney, Christopher W. Kelley, and submit the following Objection to the Motion for Relief From Automatic Stay filed by U.S. Bank Trust (hereinafter "U.S. Bank"). In support of said Objection, the Debtors state as follows:

1. On September 13, 2017, the Debtors commenced this action by filing a voluntary petition under Chapter 13 of the Bankruptcy Code.
2. On October 29, 2020, U.S. Bank filed a Motion for Relief From the Automatic Stay due to the Debtors' failure to make timely post-petition payments.
3. It is the undersigned's understanding that the Debtors intend to become current with the missed post-petition payments.

WHEREFORE, the Debtors respectfully request the Honorable Court to grant them the following relief:

- A. Grant this Objection to Motion For Relief From Automatic Stay;
- B. Deny U.S. Bank's Motion for Relief From Automatic Stay; and
- C. Grant such other and further relief as is just and equitable.

Respectfully submitted,

James M. Hosking
Jennifer L. Hosking

By Their Attorney

Date: November 9, 2020

/s/ Christopher W. Kelley
Christopher W. Kelley, Esq.
2 Wellman Avenue, Suite 240
Nashua, NH 03064
(603) 889-7188
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CERTIFICATE OF SERVICE

I hereby certify under the pains and penalties of perjury that I have served a copy of the foregoing Objection upon the following persons at the addresses indicated by electronic filing or First Class Mail, Postage prepaid, this 9th day of November, 2020.

James and Jennifer Hosking
35 Cedar Street
Hudson, NH 03051

Michael E. Swain, Esq (U.S. Bank Trust)
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Lawrence Sumski, Chapter 13 Trustee
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United States Trustee
USTPRegion01.MR.ECF@usdoj.gov

/s/ Christopher W. Kelley
Christopher W. Kelley